

1 SHAWN A. MANGANO, ESQ.
Nevada Bar No. 6730
2 shawn@manganolaw.com
SHAWN A. MANGANO, LTD.
3 9960 West Cheyenne Avenue, Suite 170
Las Vegas, Nevada 89129-7701
4 Tel: (702) 304-0432
Fax: (702) 922-3851

6 ANNE E. PIERONI, ESQ.
Nevada Bar No. 9650
apieroni@righthaven.com
7 *Counsel at Righthaven LLC*
IKENNA K. ODUNZE, ESQ.
8 Nevada Bar No. 9885
iodunze@righthaven.com
9 *Counsel at Righthaven LLC*
RIGHHAVEN LLC
10 9960 West Cheyenne Avenue, Suite 210
Las Vegas, Nevada 89129-7701
11 Tel.: (702) 527-5900
Fax: (702) 527-5909

Attorneys for Plaintiff Righthaven LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

18 Righthaven LLC, a Nevada limited-liability company,

39 Plaintiff

21 V.

22 NO QUARTER, an entity of unknown origin
23 and nature; and LARRY C. JOHNSON, an
individual.

24 Defendants.

Case No.: 2:10-cv-01022-JCM-GWF

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO RESPOND TO
DEFENDANT LARRY C. JOHNSON'S
MOTION TO DISMISS AND CONSENT
TO SET ASIDE DEFAULT**

(FOURTH REQUEST)

1 IT IS HEREBY STIPULATED BETWEEN Righthaven LLC ("Righthaven"), by and
2 through its counsel of record, and Defendant Larry C. Johnson ("Defendant"), by and through his
3 counsel of record, that Righthaven's Response to Defendant's Motion to Dismiss (Doc. # 16,
4 18), which was due on March 18, 2011 and Defendant's reply to Righthaven's response to same
5 was due on March 28, 2011 based on a stipulation and order entered by the Court on March 16,
6 2011 (Doc. # 29), shall now be due as follows: (1) Righthaven's response to Defendant's
7 Motion Dismiss is to be filed on or before **April, 8, 2011**; and Defendant's reply to Righthaven's
8 response shall be filed on or before **April 29, 2011**.

9 This stipulation and order is entered into between Righthaven and Defendant because the
10 parties have reached agreement in various material terms to settle these proceedings but have not
11 yet reduced their understanding to writing via a formal settlement agreement. The parties wish
12 to relieve the Court of the burden associated with unnecessary filings in this action in view of the
13 fact that Righthaven's response and Defendant's reply submissions would appear to be rendered
14 moot given the nature of the settlement discussions between them. The time periods requested
15 by this stipulation should provide the parties with sufficient time to negotiate and execute a
16 written settlement agreement or, should for some unforeseen and unlikely reason a settlement is
17 not formally reduced to writing, adequate time is provided for appropriate responses to be filed
18 in connection with Defendant's Motion to Dismiss. This stipulation is sought in good faith and
19 not for purposes of delay.

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

1 Dated this 22nd day of March, 2011.

2 WOODS ERICKSON WHITAKER
3 & MAURICE LLP

4 By: /s/ Jason M. Wiley
5 JASON M. WILEY, ESQ.
Nevada Bar No. 9274
jwiley@woodserickson.com
6 1349 W. Galleria Drive, #200
Henderson, Nevada 89014

7 *Attorneys for Defendant*

SHAWN A. MANGANO, LTD.

By: /s/ Shawn A. Mangano
SHAWN A. MANGANO, ESQ.
Nevada Bar No. 6730
shawn@manganolaw.com
9960 West Cheyenne Avenue, Suite 170
Las Vegas, Nevada 89129-7701

ANNE E. PERONI, ESQ.
Nevada Bar No. 9630
aperoni@righthaven.com
Counsel at Righthaven LLC
Righthaven LLC
9960 West Cheyenne Avenue, Suite 210
Las Vegas, Nevada 89129-7701

12 *Attorneys for Plaintiff Righthaven LLC*

13
14
15
16
17
18
19
20 **IT IS SO ORDERED:**

21 
22 **UNITED STATES DISTRICT COURT JUDGE**

23 **DATED:** March 25, 2011